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***ATTORNEYS FOR PRIEST CATTLE COMPANY, LTD
AND PRIEST VICTORY INVESTMENT LLC***

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

IN RE: McCLAIN FEED YARD, INC., et al.,¹ <i>Debtors.</i>	CASE NO. 23-20084-7-rlj Chapter 7 Jointly Administered
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**STIPULATION FOR WITHDRAWAL OF OBJECTION TO RULE 2004 MOTION
FILED BY PRIEST CATTLE COMPANY, LTD. AND PRIEST VICTORY
INVESTMENT LLC AND STIPULATION**

Rabo AgriFinance LLC (“**Rabo**”) and Priest Cattle Company, Ltd. and Priest Victory Investment LLC (collectively, “**Priest**”) by and through their respective attorneys, hereby file this Stipulation for Withdrawal of Rabo’s Objection to Priest Cattle Company, Ltd. and Priest Victory Investment LLC’s Ex Parte Motion for Rule 2004 Order Authorizing Issuance of Document Subpoenas to Various Third Parties (Docket No. 266) and respectfully request the Court enter an Order authorizing Priest to issue subpoenas subject to Rabo’s right to object to the requests

¹ The Debtors in these Chapter 7 cases are: McClain Feed Yard, Inc. (Case No. 23-20084-RLJ), McClain Farms, Inc. (Case No. 23-20085-RLJ), and 7M Cattle Feeders, Inc. (Case No. 23-20086-RLJ).

contained in the subpoenas.

In support hereof, Rabo and Priest stipulate and agree as follows:

1. Priest filed its Ex Parte Motion for Rule 2004 Order Authorizing Issuance of Document Subpoenas to Various Third Parties (Docket No. 265) on July 12, 2024 (the “**Motion**”). Priest attached a proposed order to the Motion (Docket No. 265-1) (the “**Proposed Order**”).

2. Rabo subsequently filed an Objection to Priest Cattle Company, Ltd. and Priest Victory Investment LLC’s Ex Parte Motion for Rule 2004 Order Authorizing Issuance of Document Subpoenas to Various Third Parties (Docket No. 266) (the “**Objection**”).

3. Subject to the rights Rabo has to object to the any subpoena served on it or any of its agents, experts or consultants (including Focus Management Group) pursuant to the Motion, Rabo has agreed to withdraw its Objection. Moreover, Micheal Johnson, counsel for Rabo, has agreed to accept service of the subpoenas issued to Rabo and Focus Management Group.

4. Based upon the forgoing withdrawal and stipulation, Priest requests that the Court enter the Proposed Order as filed on July 12, 2024.

DATED this 28th day of August, 2024.

/s/ Kyle K. Weldon

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--and--

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CERTIFICATE OF SERVICE

I hereby certify that on August 28, 2024, the foregoing document was served using the Court's CM/ECF system, which sent notice of electronic filing to all electronic filing users in each case.

/s/ Kyle K. Weldon
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